



December 6, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Subject: *WC Docket No. 10-90
Performance Measures for CAF Phase II support recipients (DA 17-1085)*

Dear Ms. Dortch:

This is in response to the public notice seeking to update the record regarding performance measures for certain Connect America Fund ("CAF") Phase II support recipients, including auction winners.¹

In formulating performance measures for CAF Phase II auction winners, Hughes Network Systems ("Hughes") urges the Commission to bear in mind that obligations to conduct network performance measurements will impose burdens on support recipients. These burdens will fall hardest on smaller entities that may receive CAF support, such as rate-of-return recipients and some auction winners. The Commission therefore should work to minimize these burdens and leverage existing programs. Accordingly, Hughes recommends that the FCC dovetail the CAF performance testing with other required performance measures. A good example of one such effort is Measuring Broadband America, in which Hughes and a significant number of operators already participate.²

In the event the FCC chooses to impose a new requirement, Hughes urges the FCC to select a software approach where the software resides on the operators' modems. This will provide the FCC with the information required while minimizing unnecessary burdens on the operator.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/

Jennifer A. Manner
Senior Vice President, Regulatory Affairs

¹ "Comment Sought on Performance Measures for Connect America High-Cost Universal Service Support Recipients," Public Notice, DA 17-1085 (rel. Nov. 6, 2017).

² See id. at ¶¶ 3, 9.